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November 29, 2004

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., TW-B204
Washington, D.C. 20554

Re: *Unbundled Access to Network Elements*, WC Docket No. 04-313 and
Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, CC Docket No. 01-338

Dear Ms. Dortch:

On behalf of BellSouth Corporation, SBC Communications Inc., Qwest Communications International Inc., and the Verizon telephone companies, I am filing the enclosed white paper entitled, "CLEC Criticisms of the *UNE Fact Report 2004* Are Misplaced."

In accordance with this Commission's practice, we are filing this letter electronically through the Commission's Electronic Comment Filing System in the above-referenced matters. Thank you for your assistance in this matter.

Sincerely,

/s/ Evan T. Leo

Evan T. Leo

Enclosure